

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHOLEM WEISNER and SHMUEL NEMANOV)	
)	Case No.: 20-cv-02862-AKH
Plaintiff and Involuntary Plaintiff)	(“ <i>Weisner I</i> ”)
)	Case No.: 23-cv-08186-AKH
v.)	(“ <i>Weisner II</i> ”)
)	
GOOGLE LLC)	
)	
Defendant)	
)	
)	

**PLAINTIFF SHOLEM WEISNER’S
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

PLEASE TAKE NOTICE that Plaintiff, SHOLEM WEISNER (“Weisner”), by and through its undersigned counsel, respectfully moves, pursuant to the Court’s Individual Rule 4.B, for permission to leave to file materials under seal. Specifically, Weisner seeks to file the following materials under seal: Plaintiff’s Memorandum of Law in Support of Motion to Compel Discovery and for Sanctions; and Exhibits 1-A, 1-C, 1-D, 1-E, 1-F, 1-G, 1-H, 1-J, 1-K, 1-L, 1-M and 1-N to the Declaration of Aaron W. Davis. As required by Rule 4(B) of the Court’s Individual Rules and Practices, each of these exhibits has been contemporaneously filed on ECF under seal.

Good cause exists to file the entirety or portions of each of these exhibits under seal. These exhibits, which have been designated as either HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY or CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the Protective Order (Dkt. 155). Plaintiff has filed redacted versions of the Memorandum and the exhibits on the public docket.

Accordingly, Plaintiff respectfully requests that the Court grant this motion for leave to file his Memorandum of Law in Support of Motion to Compel Discovery and for Sanctions; and Exhibits 1-A, 1-C, 1-D, 1-E, 1-F, 1-G, 1-H, 1-J, 1-K, 1-L, 1-M and 1-N to the Declaration of Aaron W. Davis under seal and in redacted form on the public docket.

Dated: July 14, 2025

Respectfully Submitted:

/s/ Aaron W. Davis.
Aaron W. Davis, Esq. (admitted *Pro Hac Vice*)
VALHALLA LEGAL, PLLC
P.O. Box 735
Custer, SD 57730-0735
Phone: (763) 957-2397
Email: davis@valhallalegal.com

Jacob Ginsburg, Esq.
JACOB GINSBURG, ESQ. PLLC
One Concord Drive
Monsey, NY 10952
Phone: (845) 371-1914
Email: jg@jacobginsburglaw.com

Alan M. Dershowitz, Esq. (admitted *Pro Hac Vice*)
1500 Ocean Drive
Miami Beach, FL 33139
Email: alandersh@gmail.com

Attorneys for Plaintiff, Sholem Weisner

CERTIFICATE OF SERVICE:

This will certify that a true and accurate copy of the foregoing was filed and served electronically on all counsel of record via the Court's CM/ECF system, on this 14th day of July, 2025.

/s/ Aaron W. Davis.
Attorney for Plaintiff, Sholem Weisner